

## SUPPLEMENTAL DECLARATION OF JINNIE JINHUEI CHANG CHAO

(Regarding Attorney Fees and Billing Practices)

I, Jinnie Jinhuei Chang Chao, declare as follows:

1. This Supplemental Declaration is submitted to address the disputed legal fees billed by Mr. Bernard Kornberg and his firm Miller Nash LLP, which I contend were improper and never approved by the Court.

2. Exhibits A–C are attached hereto as true and correct copies supporting my statements regarding the fee dispute.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: August 17, 2025

  
Jinnie Jinhuei Chang Chao

Exhibits Attached: A, B, C

 **FILED**  
**AUG 20 2025**

U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

**Exhibits**

Exhibit A: Email and text from Mr. Kornberg dated June 23, 2025 regarding his final bill.

Exhibit B: Email from Mr. Kornberg dated July 11, 2025 regarding arbitration notice.

Exhibit C: Court response from Judge Montali dated June 26, 2025 to my earlier declaration.

A handwritten signature in black ink, appearing to be the initials 'JS' or similar, located at the bottom center of the page.



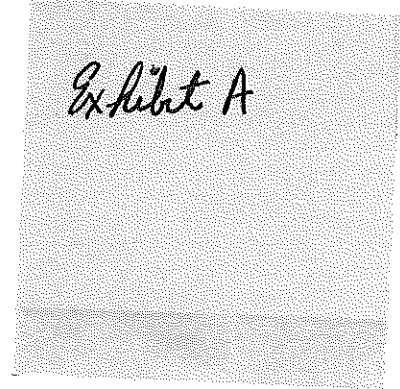
J Chao &lt;jchao888@gmail.com&gt;

**FW: Final Bill**

1 message

**Kornberg, Bernie** <Bernie.Kornberg@millernash.com>  
 To: "Jinnie Chao (jchao888@gmail.com)" <jchao888@gmail.com>

Mon, Jun 23, 2025 at 1:46 PM



**Bernie Kornberg**  
 Partner

**Miller Nash LLP**  
 340 Golden Shore, Ste 450 | Long Beach, CA 90802  
 Direct: 562.247.7622 | Office: 562.435.8002  
 Email | Bio | Insights | Website

*Our attorneys regularly offer insights to address the challenges faced by our clients. To visit the Miller Nash industry-focused blog overview page on our updated website: [please click this link](#).*

**CONFIDENTIALITY NOTICE:** This email message may contain confidential or privileged information. If you have received this message by mistake, please do not review, disclose, copy, or distribute the email. Instead, please notify us immediately by replying to this message or telephoning us. Thank you.

**From:** Kornberg, Bernie  
**Sent:** Wednesday, June 11, 2025 1:33 PM  
**To:** Jinnie Chao (jchao888@gmail.com) <jchao888@gmail.com>  
**Cc:** Haeffner, Marci <Marci.Haeffner@millernash.com>  
**Subject:** Final Bill

Jinnie,

I hope all is well. Attached is our final bill in this matter, which totals \$192,652.33. It includes the \$136,817 in fees that were incurred after the mediation, along with \$24,941.40 in costs (including those of David Golbahar) and \$56,576.43 in the unpaid balance of fees that largely occurred at or before the mediation. Your \$25,000 retainer has been applied, leaving this balance.

Please feel free to call if you want to discuss anything. Again, it was a pleasure working for you in this matter.

Bernie

**593510.0001 Invoice 2259537.pdf**  
 92K



Jinnie Chao  
30 Pilarcitos Ct  
Hillsborough, CA 94010

Account: 593510.0001  
adv. A. Salem D.D.S. Inc.

Invoice: 2259537  
June 11, 2025

**Invoice Summary**

Professional Fees Through June 10, 2025	\$136,817.00
Less Fee Reduction	<u>\$-682.50</u>
Total Current Fees	\$136,134.50
Disbursements	<u>\$24,941.40</u>
Amount Due - Current Period:	\$161,075.90
Prior Balance Due:	<u>\$56,576.43</u>
Total Amount Due	<u>\$217,652.33</u>
Less Funds Held in Trust	<u>\$25,000.00</u> CR
Total Amount Due	<u>\$192,652.33</u>

**To pay by wire transfer, route to:**

Miller Nash LLP, U.S. Bank National Association  
Account # 1536-0646-7352, Routing # 123000220,  
Swift Code USBKUS44IMT  
Bank address: Portland Main Complex, 555 SW Oak St,  
Portland, OR 97204

**To pay by credit card, use this link:**

<https://secure.lawpay.com/pages/millernash/operating>

**To pay by check, remit to:**

PO Box 3585  
Portland, OR 97208-3585

Accounts due and payable in U.S. dollars upon receipt. Please include invoice number with remittance.  
Invoice may not include all fees and expenses incurred prior to statement closing date. Late charges of .75% per month (9% annually) will accrue on all amounts unpaid after 30 days from date of invoice. Tax ID # 46-4958489.

June 11, 2025

**Invoice Detail**

<b><u>Date</u></b>	<b><u>Professional</u></b>	<b><u>Time</u></b>	<b><u>Description of Services</u></b>
03/03/25	B. Morrison	3.4	Analyze memorandum of interviews re Darrow Chu and Dr. Salem (3.2); coordinate filing of pro hac application with paralegal (.2)
03/04/25	B. Kornberg	1.1	Communicate with Chao's counsel re providing initial disclosures; Call with client re trial preparation; additional perpetration with Brianna Morrison
03/04/25	B. Morrison	1.4	Call with Jinnie Chao and Bernie Kornberg re trial strategy (1.1); call and email to Bruce re transfer of files (.3)
03/05/25	B. Morrison	1.6	Review deposition transcript of Ardeshir Salem
03/06/25	A. Jones	2.0	Teleconference with Brianna Morrison re state of files (.2); organize files for attorney review (1.8)
03/06/25	B. Kornberg	1.7	Draft trial subpoena to First American Title Company; communicate with Salem's counsel re subpoena and pretrial prep; additional trial perpetration including location litigation documents to review
03/06/25	B. Morrison	1.9	Confer with Bernie Kornberg re next steps to prepare for trial (1.0); confer with Amy Jones re state court pleadings (.4); review organized state court pleadings file for declarations and missing documents (.5)
03/07/25	A. Jones	5.4	Teleconference with Brianna Morrison re document collection (.2); analyze discovery and draft tables re amounts allegedly embezzled (5.2)
03/07/25	B. Kornberg	0.5	Call with Salem's counsel re trial issues
03/07/25	B. Morrison	2.6	Coordinate chart of transfers with legal assistant (.5); review chart and begin entering Jinnie Chao's responses to alleged transfers (1.4); continue reviewing Salem's discovery documents produced re alleged transfers (.7)
03/10/25	B. Kornberg	0.5	Review Fellows trial subpoena (.2); communicate with court re trial issues (.2); communicate with counsel for First American Title re subpoena (.1)

Miller Nash LLP

June 11, 2025

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/11/25	B. Kornberg	0.5	Reviewed additional correspondence sent by client; call with counsel for First American re subpoena
03/12/25	B. Morrison	0.4	Review chart of transfers re impeachment for trial
03/13/25	A. Jones	2.0	Organize files for attorney review, including bookmarking Box file scans (Box 2 through pg. 350)
03/13/25	B. Kornberg	2.1	Trial perpetration with Brianna Morrison; call with Jinnie Chao; call with expert re pretrial preparation
03/13/25	B. Morrison	6.7	Confer with Bernie Kornberg re to-do list; confer with Golbahar re surprise expert testimony; prepare initial disclosures and cover letter re same; analyze documents and emails received from client week of March 10, 2025
03/14/25	A. Jones	4.8	Organize files for attorney review, including bookmarking Box file scans (Box 2 complete; begin Box 1 through pg. 1833)
03/16/25	B. Kornberg	0.4	Initial review of subpoena from First American Title
03/17/25	A. Jones	1.5	Organize files for attorney review, including bookmarking Box file scans (Box 1 complete)
03/17/25	B. Morrison	3.2	Prepare draft exhibit list for trial
03/18/25	B. Kornberg	1.4	Trial perpetration meeting; email to Court re exhibits; call and emails with Deepa Subramaniam re testimony at trial
03/18/25	B. Morrison	5.2	Confer with Bernie Kornberg re preparation for trial; Call with Deepa Subramaniam ; Email with Darrow Chu; review documents produced by First American Title re subpoena; research admissibility of prior bad acts for motion in limine
03/19/25	A. Jones	2.4	Analyze files re restitution amounts; organize documents for trial for attorney review
03/19/25	B. Kornberg	0.5	Revised letter re initial disclosures and draft cover letter

June 11, 2025

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/19/25	B. Morrison	5.3	Revise chart with client explanations of transfers; review drop box files from Bruce Jenke for potential trial exhibits; review Martinez v. Salem file;
03/20/25	B. Kornberg	1.6	Call with client re locating documents for trial and related issues; internal call to discuss additional trial preparation; prepare trial brief
03/20/25	B. Morrison	1.5	Call with Jinnie Chao; continue searching for exhibits for witness and exhibit list
03/21/25	B. Kornberg	2.4	Draft trial brief; internal call to discuss review of evidence re Wells Fargo account; call with client re same
03/21/25	B. Morrison	6.2	Continue reviewing document file for potential impeachment exhibits
03/22/25	A. Jones	3.5	Organize discovery documents for attorney review
03/22/25	B. Kornberg	3.1	Additional drafting and revisions to trial brief as to statute of limitations and claims, along with reviewing client comments and incorporating them
03/22/25	B. Morrison	6.8	Continue reviewing discovery re exhibits for trial
03/23/25	B. Kornberg	7.4	Review all documents for trial and exhibit preparation
03/23/25	B. Morrison	0.9	Continue reviewing discovery to add exhibits to witness and exhibit list
03/23/25	B. Morrison	4.1	Revise witness and exhibit list
03/24/25	A. Jones	4.4	Analyze documents for use as trial exhibits; organize trial exhibits
03/24/25	B. Kornberg	9.8	Revise and finalize pretrial brief; additional review of potential exhibits and inclusion in exhibit list; revise witness list; communicate internally re same; call and email with client re edits
03/24/25	B. Morrison	1.3	Continue revising witness and exhibit list

June 11, 2025

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/24/25	B. Morrison	11.4	Finalize exhibit list and compile exhibits for service; draft witness list; review and revise trial brief
03/25/25	B. Kornberg	4.6	Sent trial briefs to client; communicate with Salem's counsel re meet and confer; meet and confer; draft motion in limine #2; revise motion in limine #1
03/25/25	B. Morrison	5.9	Draft motion in limine for prior bad acts; confer with Chris D'Anjou; continue pulling exhibits for impeachment
03/26/25	A. Jones	3.5	Analysis of amounts claimed and create spreadsheet re trial brief allegations comparing same
03/26/25	B. Kornberg	3.2	Call with client and expert consultant re trial appearance; call with client re case; research issues relating to admissions of witness interviews; begin outlining Chao examination
03/26/25	B. Morrison	6.5	Coordinate preparing exhibit binders with legal assistants; confer with Bernie Kornberg and Jinnie Chao re checks and alleged transfers; review exhibit binders for revisions; review analysis of chart comparing checks to damages claimed in trial brief; continue notating Salem's deposition
03/27/25	A. Jones	2.6	Continued analysis of amounts claimed and create spreadsheet re trial brief allegations comparing same
03/27/25	B. Kornberg	2.3	Trial preparation; additional outlining of Chao examination
03/27/25	B. Morrison	8.8	Coordinate preparation of deposition binders with legal assistants (1.0); coordinate revisions to exhibit list binders with legal assistant (3.0); continue searching for impeachment documents and emails for witnesses and finalizing impeachment exhibit list (4.8)
03/27/25	B. Palmer	1.0	Research public records hearsay exception as applied to memorandum of interview by postal inspector and detective
03/27/25	B. Palmer	1.0	Research refreshing recollection exception to hearsay as applied to memorandum of interview by postal inspector and detective



June 11, 2025

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/28/25	A. Jones	2.9	Continued analysis of amounts claimed and create spreadsheet re trial brief allegations comparing same
03/28/25	B. Kornberg	8.2	Trial preparation including outlines and calls within firm and with consulting expert
03/28/25	B. Morrison	9.6	Revise impeachment exhibit list and organize exhibits for impeachment binders (5.0); confer with Bernie Kornberg and Chris D'Anjou re stipulation to evidence (.2); coordinate spreadsheet calculating checks in comparison to trial brief (.3); continue notating deposition of Salem (3.8); confer with Bernie Kornberg re same (.3)
03/28/25	B. Palmer	0.5	Review applicable memoranda of interviews in preparation for drafting pocket brief
03/29/25	B. Kornberg	8.6	Trial preparation; draft opposition to motion to leave to amend
03/29/25	B. Morrison	7.5	Finish assembling impeachment binders (2.2); begin drafting Salem impeachment outline (1.5); review Salem's responses to Jinnie's requests for admission (.8); travel to San Francisco for trial preparation session and trial (3.0)
03/30/25	B. Kornberg	12.3	Trial perpetration with client; additional outlining and preparation
03/30/25	B. Morrison	11.3	Attend trial preparation session with Jinnie Chao and Bernie Kornberg to prepare Jinnie Chao for testimony (8.5); prepare argument for motion in limine (.8); continue preparing impeachment outline for A. Salem (2.0)
03/31/25	B. Kornberg	14.5	Attend trial; prepare for next day of trial
03/31/25	B. Morrison	11.1	Attend first day of trial (8.5); confer with expert and Bernie Kornberg re strategy for second day of trial (1.5); notate interview for Salem's cross-exam outline (1.1)
03/31/25	B. Palmer	1.3	Draft pocket brief on public records exception to hearsay rules as applied to memoranda of interviews to facilitate use of memos in trial

Miller Nash LLP

June 11, 2025

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
04/01/25	B. Kornberg	12.8	Attend Trial; post-trial preparation; settlement communications with opposing counsel
04/01/25	B. Morrison	13.5	Review time stamps for impeachment (1.0); attend second day of trial (7.8); confer with Bernie Kornberg re next steps and possible settlement (1.4); prepare direct exam outline of Darrow Chu (1.5); prepare draft settlement agreement (1.6); email with Darrow Chu re notification of settlement (.1); email with Deepa Subramaniam re notification of settlement (.1)
04/02/25	B. Kornberg	2.1	Attend Court for status conference and attend to retrieval of case items and return
04/02/25	B. Morrison	2.7	Travel to courthouse to pack up trial binders (.2); pack up trial binders (1.5); attend trial status hearing (.3); coordinate disposal of trial binders (.7)
04/03/25	B. Morrison	3.0	Travel from San Francisco for trial to Portland Office (No Charge 1.5)
04/10/25	B. Kornberg	2.6	Revise settlement agreement and draft supporting documents
04/21/25	B. Kornberg	0.1	Email with Salem's counsel re review of settlement agreement
04/22/25	B. Kornberg	0.1	Communicate with Salem's counsel re execution of settlement agreement
04/24/25	B. Kornberg	0.2	Communicate with client re review and execution of settlement agreement
04/30/25	B. Kornberg	0.4	Sent signed settlement agreement to Salem's counsel with comments re final execution; prepared final settlement package and proposed order for filing
05/01/25	B. Kornberg	0.2	Reviewed order approving settlement and prepared state court case for dismissal
05/06/25	B. Kornberg	0.1	Review docket for status of dismissal

June 11, 2025

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
05/09/25	B. Kornberg	0.3	Communicate with court and Salem's counsel re dismissal of state court proceeding and execution of dismissal by Bobby Lau
05/14/25	B. Kornberg	0.2	Review notice re satisfaction of judgment and prepared amended satisfaction
05/19/25	B. Kornberg	0.1	Review status of entry of dismissal
05/22/25	B. Kornberg	0.3	Review rejection of request for dismissal and researched basis; communicate with court re basis for dismissal
05/29/25	B. Kornberg	0.2	Review communication with Court re dismissal of state court action; review order of dismissal
06/04/25	B. Kornberg	0.2	Sent filed dismissals and satisfaction to client with comments

**Fee Summary**

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
B. Kornberg	Partner	106.6	\$550	\$58,630.00
B. Morrison	Associate	143.8	455	65,429.00
B. Palmer	Associate	3.8	410	1,558.00
A. Jones	Paralegal	35.0	320	11,200.00
<b>Summary Total:</b>		<b>289.2</b>		<b>\$136,817.00</b>

June 11, 2025

**Disbursement Summary**

<b><u>Disbursements</u></b>	<b><u>Amount</u></b>
California Bankruptcy Court: Cost to submit application for pro hac vice appearance for Brianna Morrison	328.00
GOLBAHAR CONSULTING GROUP; Invoice#: 20250326 - Retainer for Golbahar Consulting	5,000.00
MERCHANT: THE WESTIN SAN FRANCISCO , Date: 3/29/2025 Cost associated with airport hotel conference room to conduct trial preparation for the following day	694.53
Vendor: GOLBAHAR CONSULTING GROUP; Invoice#: 20250328; Date: 4/4/2025 - Consulting Fees less retainer fee for Golbahar Consulting	9,438.66
MERCHANT: Sam's Grill & Seafood Restaurant, Date: 3/31/2025	211.97
MERCHANT: Uber, Date: 3/31/2025	31.76
MERCHANT: Uber, Date: 3/31/2025	9.54
MERCHANT: Uber, Date: 4/2/2025	29.63
MERCHANT: Uber, Date: 4/2/2025	27.85
MERCHANT: Starbucks, Date: 3/30/2025	25.00
MERCHANT: Waymo, Date: 3/31/2025	20.38
MERCHANT: Cafe 450, Date: 4/1/2025	13.69
MERCHANT: Lyft, Date: 4/1/2025	27.31
MERCHANT: Lyft, Date: 3/31/2025	32.26
MERCHANT: Lyft, Date: 4/1/2025	10.46
MERCHANT: Lyft, Date: 4/2/2025	20.47
MERCHANT: Lyft, Date: 3/30/2025	84.00
MERCHANT: UPS, Date: 4/2/2025	187.00
Vendor: Naegell Deposition and Trial (ACH); Invoice#: 49580 - Cost of obtaining transcript of police interviews	1,956.64
Vendor: Washington Legal Messengers, Inc.; Invoice#: 383693; Cost of messenger to pick up original case file from previous attorney, and delivery to Bernie Kornberg for upcoming trial	373.00
FedEx Invoice#: 8-815-39082 - Delivery to Deepa Subramaniam on 03.27.2025	53.80
Vendor: Legal Support Network LLC (ACH); Invoice#: LA-25-32288 - Court cost for submission and first appearance fee for filing of complaint	404.85
FedEx; Invoice#: E - Delivery to Bernie Kornberg on 03.28.2025	136.38
Vendor: Washington Legal Messengers, Inc.; Invoice#: 383957; Cost of sending a messenger to pick delivery judge's courtesy copies to chambers	252.35
MERCHANT: , Date: 3/29/2025 Alaska Airline - flight for trial - 346.60 - 593510.0001	346.00
MERCHANT: Alaska Airline, Date: 3/29/2025 Alaska Airline - checked bag for binders - 35.00 - 593510.0001	35.00
MERCHANT: Grand Hyatt, Date: 3/29/2025 Grand Hyatt - hotel for trial - 2,713.50 - 593510.0001	2,713.50
MERCHANT: UBER, Date: 3/29/2025 UBER - travel for trial - 62.95 - 593510.0001	62.95
MERCHANT: UBER, Date: 3/30/2025 UBER - travel for trial - 39.64 - 593510.0001	39.64
MERCHANT: UBER, Date: 3/31/2025 UBER - travel for trial - 17.39 - 593510.0001	17.39
Miller Nash LLP	

June 11, 2025

**Disbursement Summary****Disbursements**

	<b><u>Amount</u></b>
MERCHANT: UBER, Date: 4/1/2025 UBER - travel for trial - 18.30 - 593510.0001	18.30
MERCHANT: UBER, Date: 4/2/2025 UBER - travel for trial - 17.37 - 593510.0001	17.37
MERCHANT: UBER, Date: 4/2/2025 UBER - travel for trial - 22.41 - 593510.0001	22.41
MERCHANT: UBER, Date: 4/3/2025 UBER - travel for trial - 49.44 - 593510.0001	49.44
MERCHANT: UBER, Date: 4/3/2025 UBER - travel for trial - 63.45 - 593510.0001	63.45
MERCHANT: UBER Eats , Date: 3/30/2025 UBER Eats - meals - 29.10 - 593510.0001	29.10
MERCHANT: UBER Eats, Date: 4/2/2025 UBER Eats - meals - 48.82 - 593510.0001	48.82
MERCHANT: Alaska Airline, Date: 4/2/2025 Alaska Airline - checked bag for binders - 35.00 - 593510.0001	35.00
Vendor: Legal Support Network LLC (ACH); Invoice#: LA-25-34419 - Obtain copies of case file for reference and to assist in preparing for trial	222.75
Vendor: Legal Support Network LLC (ACH); Invoice#: LA-25-34419 - Obtain copies of case file for reference and to assist in preparing for trial	375.00
Vendor: Legal Support Network LLC (ACH); Invoice#: LA-25-34419 - Obtain copies of case file for reference and to assist in preparing for trial	244.20
Vendor: Legal Support Network LLC (ACH); Invoice#: LA-25-34419 - Obtain copies of case file for reference and to assist in preparing for trial	196.00
Vendor: Legal Support Network LLC (ACH); Invoice#: LA-25-34419 - Obtain copies of case file for reference and to assist in preparing for trial	248.60
Vendor: Legal Support Network LLC (ACH); Invoice#: LA-25-34419 - Obtain copies of case file for reference and to assist in preparing for trial	339.95
Vendor: Legal Support Network LLC (ACH); Invoice#: LA-25-31542 - Cost to request case records to assist in argument for trial	201.00
Vendor: Legal Support Network LLC (ACH); Invoice#: LA-25-35377 - Cost for submission of acknowledgment of satisfaction of judgment	56.00
Vendor: Legal Support Network LLC (ACH); Invoice#: LA-25-3537 - Cost for submission of request for dismissal	56.00
Vendor: Legal Support Network LLC (ACH); Invoice#: LA-25-35377 - Court cost for submission of acknowledgment	56.00
Vendor: Legal Support Network LLC (ACH); Invoice#: LA-25-35377 - Court cost for submission of request for dismissal	78.00
<b>Disbursement Total:</b>	<b>\$24,941.40</b>

**Invoice Summary**

Professional Fees Through June 10, 2025	\$136,817.00
Less Fee Reduction	<u>\$-682.50</u>
Total Current Fees	\$136,134.50
Disbursements	<u>\$24,941.40</u>
<b>Amount Due - Current Period:</b>	<b><u>\$161,075.90</u></b>

Miller Nash LLP





Bernie Kornberg  
Partner  
bernie.kornberg@millernash.com  
562.247.7622 (direct)

July 11, 2025

**VIA USPS PRIORITY MAIL AND EMAIL**

Jinnie Chao  
30 Pilarcitos Court  
Hillsborough, CA 94010  
jchao888@gmail.com

*Exhibit B*

Subject: Past Due Invoices and Notice of Right to Initiate Fee Arbitration

Dear Jinnie:

As reflected in the enclosed statement of account, as of the date of this letter, you owe Miller Nash LLP (the "firm") \$192,652.33 for legal services provided in connection with the litigation with Dr. Ardeshtir Salem and A. Salem D.D.S. (the "Salem Litigation"). This amount does not include interest, which has accrued (and will continue to accrue) on past due amounts at the rate of nine percent per annum.

Before I respond to the merits of the Fee Motion, I would like to again remind you that Miller Nash is no longer your legal counsel. In this letter, I will respond to your legal claims with citations to cases and authority. We are not advising you on the law, but rather are providing you our position as to the claims you have raised, and as to our right to payment. I would recommend that you review this letter with new counsel.

On June 11, 2025, I sent you a final bill for the Salem Litigation. In response, you indicated that you "have no way of paying in full" and asked if the firm could set up a payment plan. I responded that the firm would consider a payment plan and asked you to propose terms for the firm to consider. Rather than providing proposed terms for a payment plan, on June 18, 2025, you filed with the Bankruptcy Court a Motion to Disallow Unapproved Attorney Fees and Costs (the "Fee Motion"). And since your June 11, 2025, email requesting a payment plan, you have not responded to any of my calls, emails, or texts asking to discuss this matter further.

The Fee Motion has no merit. The requirement that your attorneys be approved by the Bankruptcy Court ended upon confirmation of your Chapter 11 Plan. The Chapter 11 plan filed on April 23, 2024 provides that "[o]n the Effective Date, all property of the estate and interests





of the Debtor will vest in the reorganized Debtor pursuant to § 1141(b) of the Bankruptcy Code." The plan defines the effective date as "[t]he fifteenth day following the date of the entry of the order of confirmation." On April 25, 2024, the Bankruptcy Court issued an order confirming the Chapter 11 plan. Accordingly, on May 10, 2024, your bankruptcy estate reverted. At that time, there was not an estate to represent or pay professionals. You were free to hire professionals without approval of the Bankruptcy Court as to both hiring and compensation.

On July 1, 2024, you entered into an engagement with the firm whereby you agreed to pay the firm for services provided in connection with the Salem Litigation. A copy of your signed engagement letter is enclosed. You were fully informed and aware that the cost to proceed to trial in the Salem Litigation would exceed \$100,000. You repeatedly stated that you were not interested in settlement, and the firm ultimately secured a settlement with no payment to Salem. This was the exact result you stated was your goal when we went to trial. The firm is confident that a fee arbitrator or the court will conclude that the firm is entitled to payment in full for its services.

Until the firm receives payment in full of its outstanding invoices (or until arrangements satisfactory to the firm have been made for payment of the outstanding invoices), the firm intends to proceed with its legal rights to collect payment under the Engagement Agreement and applicable law. In accordance with the Rules of the California State Bar and the Business and Professions Code, we enclose a copy of the Notice of Client's Right to Arbitration, which informs you of your right to proceed with Mandatory Fee Arbitration as provided by Business and Professions Code section 6200 et seq. We also enclose the Request for Arbitration of a Fee Dispute, which you can submit to the State Bar to initiate fee arbitration. An online version of this form, and other information, can be found on the State Bar's website at the following link: <https://www.calbar.ca.gov/Attorneys/Compliance-Records/Mandatory-Fee-Arbitration/Forms-Resources>.

If you do not request Mandatory Fee Arbitration within 30 days of receipt of this notice, or by August 15, 2025, whichever is later, the firm intends to commence legal proceedings. If you wish to discuss this letter, please feel free to call, text, or email. I am happy to have any reasonable discussion on this matter.

4897-8475-6308.3



Jinnie Chao  
July 11, 2025  
Page 3



Respectfully,

A handwritten signature in cursive script, appearing to read 'Bernie Kornberg'.

Bernie Kornberg

Enclosures

4897-8475-6308.3

MILLERNASH.COM

## **Enclosure 1**

### **Notice of Client's Right to Fee Arbitration**



# Notice of Client's\* Right To Fee Arbitration

Client's Name: Jinnie Chao  
 Client's Address: 30 Pilarcitos Ct  
 Client's City, State & Zip: Hillsborough, CA 94010

Attorney's Name: Bernie Kornberg  
 Attorney's Address: 340 Golden Shore, Ste 450  
 Attorney's City, State & Zip: Long Beach, CA 90802

You have an outstanding balance for fees and/or costs for professional services in the amount of 192,652.33 in fees and costs, \$744.63  
 charged to you in the matter of Ardeshir Salem etl v. Jinnie Jinhuei Chang Chao, 16-03023, Bankr. N.D. Cal., and related matters

☐ I have filed a lawsuit against you in the:

Court: \_\_\_\_\_ Case No.: \_\_\_\_\_  
 Address: \_\_\_\_\_

☐ I have filed an arbitration proceeding against you with the:

Agency: \_\_\_\_\_ Case No.: \_\_\_\_\_  
 Address: \_\_\_\_\_

☒ No lawsuit or arbitration proceeding has yet been filed but may be filed if we do not resolve this claim.

You have the right under Sections 6200-6206 of the California Business and Professions Code to request arbitration of these fees or costs by an independent, impartial arbitrator or panel of arbitrators through a bar association program created solely to resolve fee disputes between lawyers and clients.

You will LOSE YOUR RIGHT TO ARBITRATION UNDER THIS PROGRAM if:

1. YOU DO NOT FILE A WRITTEN APPLICATION FOR ARBITRATION WITH THE BAR ASSOCIATION WITHIN 30 DAYS FROM RECEIPT OF THIS NOTICE USING A FORM PROVIDED BY THE LOCAL BAR ASSOCIATION OR STATE BAR OF CALIFORNIA FEE ARBITRATION PROGRAM; OR
2. YOU RECEIVE THIS NOTICE AND THEN EITHER (1) ANSWER A COMPLAINT I HAVE FILED IN COURT; OR (2) FILE A RESPONSE TO ANY ARBITRATION PROCEEDING THAT I HAVE INITIATED FOR COLLECTION OF FEES, AND/OR COSTS, WITHOUT FIRST HAVING SERVED AND FILED A REQUEST FOR ARBITRATION UNDER THIS PROGRAM; OR
3. YOU FILE AN ACTION OR PLEADING IN ANY LAWSUIT WHICH SEEKS A COURT DECISION ON THIS DISPUTE OR WHICH SEEKS DAMAGES FOR ANY ALLEGED MALPRACTICE OR PROFESSIONAL MISCONDUCT.

I have the right to file a lawsuit against you if you give up your right to mandatory fee arbitration. If I have already filed a lawsuit or arbitration, you may have the lawsuit or arbitration postponed after you have filed an application for arbitration under this program.

I have determined that:

☐ There is a local program which may have jurisdiction to hear this matter. The arbitration program listed below is available to you:

Name of Program: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 City, State & Zip: \_\_\_\_\_  
 Telephone No.: \_\_\_\_\_

You may wish to check the State Bar's website at [www.calbar.ca.gov](http://www.calbar.ca.gov) to see if there are other programs available to you.

☒ There is no approved local program which has jurisdiction to hear this matter.

The State Bar of California will conduct fee arbitration (1) where there is no approved local program, (2) where there is a local program but it declines for any reason to hear your case, (3) where there is a local program and you wish non-binding arbitration of this dispute and the local program refuses to allow non-binding arbitration of your dispute, or (4) if you believe you cannot receive a fair hearing before the local bar named above. If you need assistance, please contact Mandatory Fee Arbitration, State Bar of California, 180 Howard Street, San Francisco, CA 94105-1639, (415) 538-2020.

Date: July 11, 2025

Attorney: /s/ Bernie Kornberg

\*The request for arbitration may also be made by a person who is not the client but who may be liable for or entitled to a refund of attorney's fees or costs.

(Mandatory State Bar Approved Form Rev. March 2013)

Exhibit C



Signed and Filed: June 26, 2025

*Dennis Montali*

DENNIS MONTALI  
U.S. Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

In re ) Bankruptcy Case  
JINNIE JINHUEI CHANG CHAO, ) No. 15-31519-DM  
Debtor. ) Chapter 11  
)

ORDER REGARDING FILINGS OF JUNE 18, 2025

On June 18, 2025, Debtor filed the following documents with the court:

- 1) Notice of Self-Representation (Dkt. 417);
- 2) Motion to Disallow Unapproved Attorney Fees and Costs (Dkt. 418);
- 3) Motion for Final Decree and Entry of Discharge (Dkt. 419);
- 4) Declaration in Support of Motion to Disallow Fees and Final Decree (Dkt. 420); and
- 5) Certificate of Service (Dkt. 421).

The court notes that Debtor in this confirmed Chapter 11 case is now proceeding in pro se. Debtor is still expected to

1 continue to fulfill all the requirements of a reorganized  
2 debtor.

3 Her Motion for a Final Decree (Dkt 419) states that all  
4 payments required under the confirmed Plan have been made, but  
5 there is no separate proof of that fact, nor proof of service on  
6 the creditors who were identified in the Plan and are entitled  
7 to be paid. More specifically, the Plan, that was confirmed in  
8 2024, lists two classes of impaired creditors who were to be  
9 paid over a five-year period. This case is not even close to  
10 that deadline and there is no way of verifying that Debtor has  
11 paid them.

12 Debtor also seeks entry of her discharge in the same  
13 motion. That request should be by separate motion. Further,  
14 the Debtor has not established that she is eligible for a  
15 discharge as she has not shown that she has complied with Fed.  
16 R. Bankr. P. 4004(c)(4).

17 Debtor also complains about fees requested by her former  
18 litigation counsel in A.P. 16-3023 (Dkts. 418 & 420). But she  
19 has not served that counsel with any of the June 18, 2025  
20 submissions and there is no current request for any fees from  
21 that counsel. If either Debtor or counsel believes that is a  
22 matter for this court to decide, she or it needs to set the  
23 matter for hearing on proper notice to all parties.

24 The court will not take any action until Debtor takes care  
25 of these discrepancies and complies with the appropriate notice  
26 procedures.

27 \*\*END OF ORDER\*\*  
28

COURT SERVICE LIST

Jinnie Jinhuei Chang Chao  
1900 S. Norfolk Street #350  
San Mateo, CA 94403

Jinnie Jinhuei Chang Chao  
30 Pilarcitos Court  
Hillsborough, CA 94010

**OFFICIAL BUSINESS**

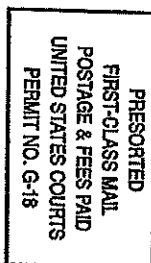
UNITED STATES BANKRUPTCY COURT

PENALTY FOR PRIVATE USE, \$300

CONTAINS NOTICE of a PROCEEDING

In the

UNITED STATES BANKRUPTCY COURT



**FIRST-CLASS MAIL**

## PROOF OF SERVICE

I am a resident of San Mateo County, California. I am over the age of eighteen years and not a party to the within action. My business address is 30 Pilarcitos Court, Hillsborough, CA 94010.

On August 16, 2025, I served the following documents in the matter of In re Jinnie Jinhuei Chang Chao, Debtor, Case No. 15-31519, Adversary No. 16-03023, United States Bankruptcy Court, Northern District of California:

1. Supplemental Declaration Regarding Counsel's Fees and Billing Practices (Packet 1)
2. Supplemental Declaration Regarding Improper Waiver of \$2.1M Judgment (Packet 2)


I served the documents by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States Mail at Hillsborough, California, addressed as follows:

Hon. Dennis Montali  
United States Bankruptcy Court  
450 Golden Gate Avenue  
San Francisco, CA 94102

Bernard Kornberg, Esq.  
Miller Nash LLP  
340 Golden Shore, Suite 450  
Long Beach, CA 90802

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 17, 2025, at Hillsborough, California.

  
Jinnie Jinhuei Chang Chao